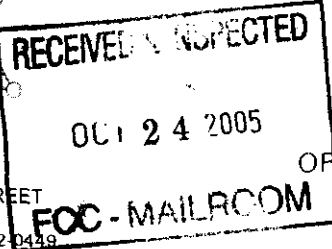




**SHERIFF-CORONER DEPARTMENT
COUNTY OF ORANGE
CALIFORNIA**

**MICHAEL S. CARONA
SHERIFF-CORONER**

550 N. FLOWER STREET
P.O. BOX 449
SANTA ANA, CA 92702-0449
(714) 647-7000



OFFICE OF SHERIFF-CORONER

ASSISTANT SHERIFFS
JO ANN GALISKY
PETE GANNON
DON HAIDL
KIM MARKUSON
DOUG STORM

September 12, 2005

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW Washington, DC 20554

DOCKET FILE COPY ORIGINAL

RE: WT Docket 05-196

Dear Ms. Dortch:

I am writing on behalf of an upcoming FCC decision regarding VoIP and 9-1-1.

The Orange County Sheriff Department serves 12 contract cities and the unincorporated area of the County of Orange, California. Our service area is 742 square miles and serves a population of 800,000. In a typical year, the Sheriff's Dispatch Center handles approximately 125,000 telephone calls to 9-1-1 and an additional 800,000 non-emergency telephone calls.

As the Sheriff, I support the FCC's ruling to require interconnected VoIP providers ensure they are able to deliver accurate location and call back information to the Public Safety Answering Point (PSAP) and to Secondary PSAP when their customer calls 9-1-1.

The same issues we faced with W911 are true of VoIP in the ability to obtain the caller's location as quickly as possible in a time of emergency situations. Every second is crucial to getting the first responders to the caller's location with minimal delays and could mean the difference between life and death.

For every call the PSAP and Secondary PSAP receive, the ability to have the location of the person calling enhances the ability to process the call more efficiently and quickly. This can also be the difference in the PSAP and secondary PSAP personnel being able to focus on additional needs of the caller prior to first responders arriving. The impact to staffing and the ability to process calls becomes diminished with each call trying to determine a person's location, especially when potentially they may not be able to speak.

We do not believe the Commission should extend the 120 day deadline for interconnected VoIP providers to provide enhanced 9-1-1 services to their customers. We recommend that the Commission ensure that any requirements imposed on VoIP providers does not cause undue burden on the PSAP or Secondary PSAP's and our ability to process and dispatch emergency response to a 9-1-1 call. On behalf of the OCSD, I would also like the Commission to take in to consideration the operational

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PROUDLY SERVING THE UNINCORPORATED AREAS OF ORANGE COUNTY AND THE FOLLOWING CITIES AND AGENCIES:

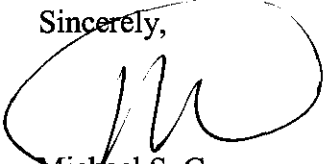
ALISO VIEJO • DANA POINT • LAGUNA HILLS • LAGUNA NIGUEL • LAGUNA WOODS • LAKE FOREST • MISSION VIEJO
RANCHO SANTA MARGARITA • SAN CLEMENTE • SAN JUAN CAPISTRANO • STANTON • VILLA PARK
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**DRUG USE
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Page Two

requirements of the current PSAP infrastructure and should not impose rules that will require considerable upgrades or replacement of PSAP equipment.

Sincerely,

A handwritten signature in black ink, consisting of a large, stylized 'M' followed by a cursive 'C' and 'A'. The signature is enclosed within a large, hand-drawn oval.

Michael S. Carona
Sheriff-Coroner